

Addendum to Permitting Enforcement Agenda Item 10 (June 17, 1997)
Comments Received from 45 Day Comment Period Alternative Daily Cover Regulations

COMMENT LETTERS									
NUMBER	DATE RECEIVED	NAME	COMPANY OR AGENCY	STREET ADDRESS	CITY	STATE	ZIP	PHONE	FAX
45 Day Comment Period Letters									
C01	4/23/97	Daphne Washington	Kern County Waste Management Department	2700 "M" Street, Suite 600	Bakersfield	CA	93301	805 862 8900	805 862 8901
C02	4/29/97	Gerald deRoco	Glenn County Public Works Department Solano County Solid Waste Local	777 N. Colusa Street	Willows	CA	95988-2298	916 934 6530	916 934 6533
C03	5/8/97	Clifford Covey	Enforcement Agency (IEA) Santa Barbara Solid Waste Local	601 Texas Street	Fairfield	CA	94533-6301	707 421 6765	707 421 4805
C04	5/11/97	Mike Schmaeling	Enforcement Agency Kings County Solid Waste Local	2125 Centerpointe Parkway #333	Santa Maria	CA	93455-1340	(805) 346 8466	(805) 346 8485
C05	5/13/97	Raymond Cooke	Enforcement Agency (IEA)	330 Campus Drive	Hanford	CA	93230	209 584 1411	209 584 6040
C06	5/27/97	David Long	Diversified Minerals Inc.	P.O. Box 3603	Ventura	CA	93006-3603	805 642 8845	805 642 8728
			Yolo County Department of Public Works and Transportation Division of Integrated Waste Management						
C07	5/28/97	Ramin Yazdani		600 A Street, Room 158	Davis	CA	95616	(916) 757 5577	(916) 757 5570
C08	6/5/97	Mark Leary	Browning Ferris Industries	915 L Street, Suite 1140	Sacramento	CA	95814	(916) 552 7080	(916) 552 7090
			San Bernardino Solid Waste Local Enforcement Agency (IEA)						
C09	6/5/97	Mark Stevens	Contra Costa County Solid Waste Local Enforcement Agency (IEA)	385 N Arrowhead Ave	San Bernardino	CA	92415-4058	(909) 387 4655	(909) 387 4323
C10	6/6/97	Richard Lee		1111 Ward St.	Martinez	CA	94553-1352	(510) 646 2521	(510) 646 2535
C11	6/6/97	Claudia Stine	City of Lompoc	City Hall, 100 Civic Center Plaza	Lompoc	CA	93438-8001	(805) 736 1261	(805) 736 5347
			Riverside County Waste Resources Management District						
C12	6/9/97	Lesley Likins		1995 Market Street	Riverside	CA	92501-1719	(909) 275 1370	(909) 275 1374
				201 N Figueroa St., Ste. 200, Mail Stop 177					
C13	6/9/97	Wayne Tauda	City of Los Angeles		Los Angeles	CA	90012	(213) 580 1040	(213) 580 1084
C14	6/10/97	Skip Lacaze	City of San Jose	777 N First St., Ste. 450	San Jose	CA	95112-6311	(408) 277 5533	(408) 277 3608
C15	6/10/97	George Nealon	Landfill Service Corp.	2183 Pennsylvania Ave	Apalachin	NY	13732	(607) 625 3050	(607) 625 2689
C16	6/10/97	Ronald Enzweiler	Water Tech Partners	5 Corte Fresca	Moraga	CA	94456	(510) 283 4918	(510) 283 7458
C17	6/10/97	Thomas Tinsley	Glenn County Public Works Dept.	777 N Colusa St.	Willows	CA	95988-2298	(916) 934 6530	(916) 934 6533
C18	6/10/97	Gerald de Roco	Glenn County Public Works Dept.	777 N Colusa St.	Willows	CA	95988-2298	(916) 934 6530	(916) 934 6533
C19	6/10/97	Charles White	WMX Technologies, Inc.	915 L Street Ste. 1430	Sacramento	CA	95814	(916) 448 4675	(916) 448 2470
			Orange County Solid Waste Local Enforcement Agency						
C20	6/10/97	Patricia Henshaw		2009 East Edinger Ave	Santa Ana	CA	92705-4720	(714) 6673600	(714) 972-0749
C21	6/10/97	Stephen Maguin	Los Angeles County Sanitation District	1955 Workman Mill Rd.	Whittier	CA	90601-1400	(310) 699 7411	(310) 695 6139
C22	6/12/97	Rick Best	Californians Against Waste	926 J St., Ste. 606	Sacramento	CA	95814	(916) 443 5422	(916) 443 3912

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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION NEEDED	SECTION/ AREA
C01-01	STORAGE TIME LIMIT FOR GREEN MATERIAL ADC IN 20690(b)(3)(C) OF 10 FROM RECEIPT AND 3 DAYS OF PROCESSING IS UNREASONABLE AND NOT SUPPORTED BECAUSE LONGER HOLDING TIMES CAN BE USED SUCCESSFULLY ESPECIALLY FOR WOODY MATERIAL.	A REVISED SECTION ADDRESSING GENERAL CONTROLS FOR STORAGE AND HANDLING OF ALL WASTE MATERIALS USED FOR ADC WILL BE PROPOSED (20690(a)(9)). THE REFERENCE TO 10/3 DAY HOLDING TIMES FOR GREEN MATERIAL WILL BE REMOVED AS REQUESTED.	YES	20690(b)(3)(B) AND (C). 20690(a)(9)
C02-01	GLENN COUNTY HAS BEEN PREPARING TO CONDUCT A DEMONSTRATION PROJECT WITH FIBERGLASS INSULATION AND WOULD LIKE TO USE OTHER MATERIALS SUCH AS SHREDDED TIRES.	COMMENT NOTED. THE PROPOSED REGULATION WOULD ALLOW FOR DEMONSTRATION OF NEW MATERIALS AS NOTED AND ALSO ALLOWS SPECIFIED USE OF SHREDDED TIRES AS ADC WITHOUT CONDUCTING A DEMONSTRATION PROJECT.	NO	GENERAL
C03-01	DOES THE 25% LIMIT ON COMPOST, CO-COMPOST, AND CHEMICALLY FIXED SEWAGE SLUDGE IN 20690(a)(8) AND PUBLIC RESOURCES CODE SECTION 42245 APPLY TO ALL COVER MATERIAL (I.E. DAILY, INTERMEDIATE, AND FINAL)?	THE REGULATION WILL BE PROPOSED TO BE CHANGED TO PROVIDE CLARITY BY APPLYING THE 25% LIMIT TO DAILY AND INTERMEDIATE COVER.	YES	20690(a)(8)
C03-02	DOES 20690(b)(4)(B) MEAN ANY COMBINATION OF INGREDIENTS OR JUST MEAN BIOSOLIDS AND JUST ONE OF THESE OTHER INGREDIENTS? FURTHER CLARITY SHOULD BE ADDED.	AS WRITTEN, THE REGULATION DOES NOT RESTRICT ONLY ONE MATERIAL TO BE BLENDED WITH BIOSOLIDS IF BLENDING IS USED.	NO	20690(b)(4)(B)
C03-03	TYPOGRAPHICAL ERROR IN 20700(d): DEMONSTRATION PROJECTS SHALL BE APPROVED BY THE EA.	THE CORRECTION WILL BE MADE AS REQUESTED BY THIS COMMENT.	YES	20700(d)
C03-04	USE OF THE TERM "EARTHEN MATERIAL" THROUGHOUT THE REGULATIONS IS AMBIGUOUS. PERHAPS A MORE PRECISE TERM OR PRECISE DEFINITION SHOULD BE USED.	THE TERM "EARTHEN MATERIAL" WAS REQUIRED BY U.S. EPA FOR APPROVAL OF CALIFORNIA'S SUBTITLE D PROGRAM. AN ATTEMPT TO CHANGE OR FURTHER DEFINE THIS TERM COULD JEOPARDIZE THE STATE'S PROGRAM AND THEREFORE A CHANGE IS NOT PROPOSED.	NO	GENERAL
C04-01	SAME AS C11-01	SAME AS C11-01	NO	20690(b)(1)
C04-02	SAME AS C11-02	SAME AS C11-02	YES	20690(b)(3)(B) AND (C)
C04-03	SAME AS C11-03	SAME AS C11-03	NO	2690(b)(4)
C04-04	SHOULD NOTE THAT FLY GRILLS SHOULD BE PLACED OVER THE ADC OR AN ATTRACTANT AS POSSIBLE. IT DOES NOT MAKE SENSE IN THE CASE OF A BLANKET TO REMOVE BLANKET FIRST SINCE THE FLY BARRIER HAS BEEN REMOVED.	COMMENT NOTED. THE PROPOSED REGULATION AS WRITTEN WOULD REFLECT SUCH INTERPRETATION. THE PROPOSED REGULATION ALLOWS USE OF LIVE TRAPS WHICH IS AN APPROVED ALTERNATIVE WHICH CAN AVOID SUCH PROBLEMS. A SPECIFIC CHANGE IN THE REGULATION IS UNNECESSARY.	NO	20695
C04-05	REGULATION SHOULD INCLUDE CAUTION THAT USING SNAP TRAP MAY CAUSE INJURY OR DEATH OF NON-TARGET ORGANISMS OR WILDLIFE.	THE PROPOSED REGULATION WILL BE REVISED AS REQUESTED BY THIS COMMENT.	NO	20695
C04-06	20695 (a)(2)(D) SHOULD BE WORDED "ATTRACTANTS, WHEN APPLICABLE".		YES	20695(a)(2)(D)

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C04-07	IF THE EA IS MAKING THE INSPECTIONS, WHY ARE THE RECORDS SUBMITTED TO THE EA (20695(a)(2)(D)?	THE PROPOSED REGULATIONS ALLOW THE EA TO REQUIRE THE OPERATOR TO MAKE AND RECORD VECTOR MEASUREMENTS. FOR CLARITY, A PROPOSED CHANGE WILL ADD "WHEN APPLICABLE".	YES	20695(a)(2)(D)
C04-08	SUGGEST ADDING IN 20695(b): THE OPERATOR SHALL DOCUMENT PERFORMANCE OF THE ADC IN CONTROLLING ANY SUCH FIRE. THE INCIDENT SHALL BE RECORDED IN THE FACILITY'S SPECIAL OCCURENCE LOG.	FURTHER DOCUMENTATION OF ADC PERFORMANCE IS UNNECCESARY FOR STATE MINIMUM STANDARDS AND WOULD BE MORE APPROPRIATELY HANDLED AS LEA PERMIT TERMS AND CONDITIONS. EXISTING FACILITY REPORTING STANDARDS WOULD REQUIRE SUCH INCIDENTS TO BE REPORTED.	NO	20695(b)
C05-01	REFERENCES TO "DISEASE VECTORS" SHOULD BE CHANGED SIMPLY TO "VECTORS". BY DEFINITION, A VECTOR CARRIES DISEASE CAUSING ORGANISMS.	CIWMB STAFF CONCUR WITH THIS COMMENT AND WILL PROPOSE TO CHANGE THE PROPOSED REGULATION AS REQUESTED.	YES	GENERAL
C05-02	IT IS SUPERFLUOUS TO REQUIRE CIWMB CONCURRENCE FOR ADC PROJECTS AS SPECIFIED IN 20690(a)(1).	THE REGULATION IS REQUIRED TO MAINTAIN SUBTITLE D PROGRAM APPROVAL. CHANGE AS REQUESTED COULD JEOPARDIZE THE STATE'S PROGRAM. THEREFORE A CHANGE IS NOT PROPOSED. NOTE THAT 20690(b)(1-10) ALLOWS CATEGORIES OF ADC USE WHICH DOES NOT REQUIRE BOARD APPROVAL.	NO	20690(a)(1)
C05-03	CHANGE 20690(a)(2) TO: "ADC AND/OR AT LEAST SIX INCHES OF COMPACTED EARTHEN MATERIAL . . ."	NO CHANGE IS NECESSARY. WHEN EARTHEN MATERIAL IS USED AS COVER IN COMBINATION WITH ADC FOR PORTIONS OF THE WORKING FACE COVERED ALONE WITH SOIL, SIX INCHES MINIMUM MUST BE USED AS PER 20690(a)(1).	NO	20690(a)(2)
C05-04	RECOMMEND 20690(b)(1)(A) BE REWORDED TO READ THAT WASTE SHALL NOT BE COVERED FOR GREATER THAN 48 HOURS WITHOUT THE PLACEMENT OF AT LEAST A TWO FOOT LAYER OF NEW WASTE OR OTHER APPROVED COVER MATERIAL.	THE PROPOSED REGULATION AS WRITTEN ALLOWS CONTINUOUS USE OF GEOSYNTHETIC BLANKETS FOR GREATER THAN 24 HOURS IF APPROVED BY THE ENFORCEMENT AGENCY. THE EA WOULD HAVE THE AUTHORITY TO RESTRICT CONTINUOUS USE TO 48 HOURS AS REQUESTED IN THE COMMENT.	NO	20690(b)(1)(A)
C05-05	20690(b)(4) STATES THAT PUBLIC CONTACT WITH SLUDGE SHALL BE PROHIBITED. DOES THIS INCLUDE CLASS A AND B BIOSOLIDS?	THE REGULATION APPLIES TO ALL SLUDGE BECAUSE DEMONSTRATION PROJECTS TO DATE HAVE ALL APPLIED A PUBLIC CONTACT PROHIBITION. HOWEVER, DEMONSTRATION PROJECTS COULD STILL BE PROPOSED PER 20690(b) TO TEST SLUDGE ADC WITHOUT THE PUBLIC CONTACT PROHIBITION.	NO	20690(b)(4)
C05-06	HOW DOES 20690(b)(4) FIT IN WITH THE 25% LIMIT OF PRC 42245?	20690(a)(8) AND PRC 42245 APPLY ONLY TO CHEMICALLY FIXED SEWAGE SLUDGE. 20690(b)(4) REFERS TO ANY SLUDGE OR SLUDGE-DERIVED PRODUCT.	NO	20690(b)(4)

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C05-07	REFERENCES TO COMPACTED MATERIAL FREE OF OPEN VOIDS SHOULD BE CHANGED TO MINIMIZE VOIDS.	OPEN VOIDS WOULD MEAN THAT THE WASTE MAY NOT BE ADEQUATELY COVERED OR COULD PROVIDE VECTOR HARBORAGE. THE REQUESTED CHANGE WOULD BE AGAINST THE BASIC REQUIREMENT OF COVER AND SUBTITLE D. THEREFORE A CHANGE WILL NOT BE PROPOSED. SEE ALSO RESPONSE C21-01.	NO	GENERAL
C05-08	THE TERM HOMOGENEOUS SHOULD BE DELETED. A HETEROGENEOUS COVER OF ADC OVERLAID WITH SOIL COULD PROVIDE GOOD COVER.	THE PROPOSED REGULATION WOULD ALLOW USE OF SOIL IN CONJUNCTION WITH ADC AS COMMENTED. HOWEVER, CIWMB STAFF CONCUR THAT THE TERM HOMOGENEOUS IS NOT TECHNICALLY SUPPORTED AND SHOULD BE DELETED TO IMPROVE CLARITY OF THE REGULATION.	YES	20690(b)(4)(B); 20690(b)(5)(a) AND 20690(b)(7)(A)
C05-09	REFERENCES TO FORECAST OF RAIN SHOULD BE LEFT TO THE STATE WATER RESOURCES CONTROL BOARD. SUGGEST REWORDING OF 20695 TO STATE THAT THE EA MAY REQUIRE THE OWNER OR OPERATOR TO DEMONSTRATE THAT THE ADC AND APPLIED THICKNESS CONTROLS, VECTORS, FIRES, ETC. AS PER 40 CFR 258.21.	DEMONSTRATION PROJECTS TO DATE HAVE SHOWN THAT USE OF FOAM OR SHREDDED TIRES REQUIRES WET WEATHER RESTRICTIONS AS SPECIFIED TO CONTROL VECTORS, ODORS, AND LITTER. THEREFORE, A CHANGE TO THIS REGULATION IS NOT SUPPORTED.	NO	20690(b)(2) AND 20690(b)(10)
C05-10		THE PROPOSED CHANGE IN WORDING IS UNNECESSARY BECAUSE 20690(b) ADDRESSES THIS REQUIREMENT.	NO	20695
C05-11	THE PROPOSED PERFORMANCE STANDARDS OF 20695 SHOULD BE REMOVED.	REMOVAL OF THE PERFORMANCE STANDARDS WOULD REDUCE THE ENFORCEMENT AUTHORITY OF EAs TO PROTECT PUBLIC HEALTH AND SAFETY. THE STANDARDS GIVE THE EA FULL FLEXIBILITY TO IMPLEMENT ONLY AS DETERMINED NECESSARY. THEREFORE REMOVAL OF 20695 IS NOT PROPOSED.	NO	20695
C05-12	LITTER AND FIRE SECTIONS OF 20695 ARE DUPLICATIVE OF OTHER SECTIONS OF GENERAL STATE MINIMUM STANDARDS.	THE LITTER AND FIRE SECTIONS OF 20695 PROVIDE MORE SPECIFIC ENFORCEMENT AUTHORITY FOR THE EA TO APPLY TO COVER OPERATIONS AND ARE CURRENTLY IN PLACE AND USED FOR DEMONSTRATION PROJECTS. THEREFORE REMOVAL OF THEM IS NOT PROPOSED.	NO	20695(b) AND (c)
C06-01	REVISE REGULATIONS TO ALLOW MODIFICATION OF SOLID WASTE FACILITIES PERMIT AFTER SUCCESSFUL DEMONSTRATION OF ADC.	PERMITTING REQUIREMENTS ARE BEYOND THE SCOPE OF THIS RULEMAKING. UNDER CURRENT DISPOSAL SITE PERMITTING REGULATIONS, PERMIT MODIFICATION OR RDSI AMENDMENT MAY BE ALLOWED TO REFLECT ONGOING ADC USE, DEPENDING ON THE SITE SPECIFIC PERMIT AND CEQA. SEE ALSO COMMENT C12-01 AND C20-01.	NO	GENERAL- PERMITTING

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C06-02	CEMENT KILN DUST AND LIME KILN DUST HAVE BEEN SUCCESSFULLY USED IN ADC- REFLECT THAT THESE MATERIALS ARE USED IN ADC SUCH AS ASH AND SLUDGE.	THESE MATERIALS HAVE BEEN SUCCESSFULLY USED IN ADC AS NOTED- CHANGES IN THE REGULATIONS WILL BE PROPOSED TO ADDRESS THIS COMMENT. PROCESSED ENERGY WASTE ADC HAS INCLUDED CEMENT KILN DUST FOR STABILIZATION- A SPECIFIC REFERENCE IS UNNECESSARY.	YES	20690(b)(4) AND (b)(5)
C07-01	SUPPORTS THE REGULATIONS AS WRITTEN AND REQUESTS THEIR EXPEDITIOUS ADOPTION	COMMENT NOTED.	NO	GENERAL
C08-01	SUPPORTS THE REGULATIONS AS WRITTEN AND REQUESTS THEIR EXPEDITIOUS ADOPTION	COMMENT NOTED.	NO	GENERAL
C09-01	DRAFT REGULATIONS DO NOT REFERENCE ANY STANDARD METHODOLOGY FOR DEMONSTRATIONS OF NEW ADC. COMPARABLE DATA AND INFORMATION MIGHT BE ENCOURAGED IF ALL LEAs FOLLOWED SIMILAR PROCEDURES.	COMMENT NOTED. THERE IS NO STANDARD METHODOLOGY TO REFERENCE BECAUSE DEMONSTRATION PROJECTS ARE SITE AND MATERIAL SPECIFIC. THE CIWMB WILL CONTINUE TO COMPILE INFORMATION ON SPECIFIC PROJECTS TO ASSIST OPERATORS AND LEAs IN CONDUCTING NEW DEMONSTRATION PROJECTS.	NO	20690(b)
C09-02	20690(b)(1)(A)- WOULD CLARITY BE IMPROVED IF: "... AND EXISTING WASTE IN-PLACE COVERED WITH NEW WASTE. ..." FOLLOWED THE WORD "REMOVED"?	THIS SECTION WILL BE REVISED TO IMPROVE CLARITY.	YES	20690(b)(1)(A)
C09-03	SAME AS COMMENT C05-06	SEE COMMENT C05-06	NO	20690(b)(4)
C09-04	EA's SHOULD HAVE ADC ODOR ENFORCEMENT AUTHORITY AND AN ADC ODOR PERFORMANCE STANDARD.	AUTHORITY TO ENSURE ADC CONTROLS ODORS IS IN 20690(a)(1). AN ODOR PERFORMANCE STANDARD IS NOT NECESSARY SINCE THE LOCAL AIR DISTRICTS HAVE JURISDICTION AS PER AB1220. THEREFORE, ENFORCEMENT MUST BE A COORDINATED EFFORT BETWEEN THE LEAs AND AIR DISTRICTS.	NO	20695
C09-05	LITTER CONTROL STANDARD NEEDS TO BE EXPANDED TO CONTROL ACCUMULATION OF EXCESSIVE ONSITE LITTER.	THIS SECTION WILL BE REVISED AS REQUESTED IN THE COMMENT. THE REQUESTED REVISION IS ALSO NECESSARY TO BE CONSISTENT WITH THE GENERAL FACILITY LITTER STANDARD (20830). THE PROPOSED REGULATIONS REFLECT THE BASIC PERFORMANCE REQUIREMENTS OF INTERMEDIATE COVER. ADDITION OF DURABLE AND STATIONARY AS SEPARATE PERFORMANCE CRITERIA IS NOT JUSTIFIED ON A TECHNICAL BASIS. THEREFORE, A CHANGE IS NOT PROPOSED.	YES	20695(b)
C09-06	REGULATIONS SHOULD REQUIRE DEMONSTRATION THAT ALTERNATIVE INTERMEDIATE COVER BE EXTREMELY DURABLE AND STATIONARY.	THE PERMIT WOULD ESTABLISH WHAT THE OPERATING DAY IS FOR THE PURPOSES OF COVER. A FACILITY WHICH CONTINUOUSLY PLACES AND COMPACTS WASTE BEYOND 24 HOURS MAY BE ABLE TO COVER AT THE END OF EACH CONTINUOUS PERIOD IF ABLE TO MEET THE PERFORMANCE REQUIREMENTS.	NO	20700(b)
196 C10-01	IF SWFP INDICATES THE HOURS OF OPERATION ARE 24 HOURS, DOES THIS MEAN THE OPERATOR WILL BE REQUIRED TO COVER FOLLOWING EVERY 24-HOUR PERIOD (20680(a) AND 20690(a)(2))?		NO	20680(a) AND 20690(a)(2)

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C10-02	SECTION 20690(b)(1)(A) ON GEOSYNTHETIC BLANKETS IS CONFUSING.	THIS SECTION HAS BEEN REVISED TO IMPROVE CLARITY. NOTE THAT THE EA WILL HAVE AUTHORITY TO APPROVE EXTENDED PERIODS OF TARP USE WITHOUT REMOVAL. (SEE C09-02)	YES	20690(b)(1)(A)
C10-03	SECTION 20690(b) REFERS TO ADCs WHICH ARE NOT REQUIRED TO CONDUCT A DEMONSTRATION PROJECT. WILL THE EA STILL BE ABLE TO REQUIRE SITE SPECIFIC CONDITIONS IN THE SWFP TO ADDRESS UNIQUE OPERATIONAL ISSUES?	YES. THE EA RETAINS AUTHORITY TO ISSUE SITE SPECIFIC CONDITIONS IN THE PERMIT.	NO	GENERAL - PERMITTING
C10-04	INSERT THE WORD "COVER" BETWEEN "TREATED AUTO SHREDDER WASTE USED FOR ALTERNATIVE DAILY COVER" AND "SHALL BE RESTRICTED TO".	CORRECTION HAS BEEN MADE AS REQUESTED	YES	20690(b)(6)(B)
C11-01	CITY OF LOMPOC IS USING ENVIRO-LANDFILL COVER (EPI) DEGRADABLE FILM AS ADC. GEOSYNTHETIC BLANKET ADC STANDARD SHOULD BE AMENDED TO INCLUDE SUCH DEGRADABLE TARP PRODUCTS.	THE PROPOSED REGULATION INCLUDES REFERENCE TO PRODUCTS INTENDED TO BE NONREUSABLE SUCH AS THE COVER PRODUCT NOTED. AMENDMENT IS NOT NECESSARY TO REFLECT USE OF SUCH PRODUCTS.	NO	20690(b)(1)
C11-02	GREEN WASTE HOLDING TIME LIMITS OF 10 DAYS FROM RECEIPT AND 3 DAYS OF PROCESSING IS EXTREMELY LIMITED AND NOT REFLECTIVE OF THE RANGE OF CONDITIONS FOR SUITABLE HOLDING TIMES. STORAGE LIMITS SHOULD BE AS DETERMINED BY THE LEA.	THE PROPOSED REGULATION WILL BE REVISED TO REFLECT THIS COMMENT. SEE RESPONSE TO COMMENT C-01-01.	YES	20690(b)(3)(B) AND (C)
C11-03	CITY OF LOMPOC USES WATER TREATMENT SLUDGE AS AN APPROVED ADC FOR DAILY, INTERMEDIATE, AND FINAL COVER. 20690(b)(4) SHOULD DELETE REFERENCE TO WATER TREATMENT SLUDGE.	THE REFERENCE IS NECESSARY TO REFLECT SUCCESSFUL DEMONSTRATION OF WATER TREATMENT SLUDGE AT SEVERAL FACILITIES. THE CITY OF LOMPOC'S USE OF THIS MATERIAL IS UNIQUE AND FULLY APPROVED. NO NEW DEMONSTRATIONS ARE REQUIRED AND 20690(b)(4) DOES NOT APPLY.	NO	20690(b)(4)
C12-01	THE PROPOSED REGULATIONS DO NOT ADDRESS PERMITTING PROCEDURES. IT IS THE DISTRICT'S OPINION THAT PERMITTING PROCEDURES FOR ADC SHOULD BE STREAMLINED OR SIMPLIFIED.	PERMITTING REQUIREMENTS ARE BEYOND THE SCOPE OF THIS RULEMAKING. ALSO SEE COMMENT C06-01 AND C20-01.	NO	GENERAL - PERMITTING
C12-02	IT IS RECOMMENDED THAT THE CIWMB REGULARLY UPDATE THE LANDFILL OPERATORS ON THE APPROVED ADC MATERIALS.	COMMENT NOTED. CIWMB MAINTAINS RECORDS OF STATEWIDE ADC USAGE AND WILL CONTINUE TO PROVIDE TECHNICAL ASSISTANCE AND TRAINING ON ADC.	NO	GENERAL
C12-03	DAILY RECORD KEEPING WILL IMPOSE A HARDSHIP TO THE LANDFILL OPERATOR AND REDUCE THE EFFICIENCY OF THE DAILY COVER OPERATION BECAUSE THE OPERATOR WILL HAVE TO WEIGH EACH LOAD OF ADC FROM ADC STOCKPILES.	PROPOSED REPORTING REQUIREMENTS FOR WASTE-DERIVED ADC WILL DELETE THE WORD "DAILY" AS REQUESTED AND REFER DIRECTLY TO 14 CCR 18800 WHICH REQUIRES GENERAL QUARTERLY MONITORING AND, WEEKLY SURVEY MONITORING AS SPECIFIED IN 14 CCR 18805.	YES	20690(a)(5)

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C12-04	20690(b) SHOULD BE REVISED TO ENSURE THAT IF AN LEA REQUIRES DEMONSTRATION PROJECTS FOR THE SUCCESSFULLY TESTED ADC MATERIALS, THE DECISION IS NOT MADE ARBITRARILY BUT IS BASED ON ACTUAL PUBLIC HEALTH AND SAFETY CONCERNS.	THE PROPOSED REGULATION WILL BE REVISED TO CLARIFY THAT DEMONSTRATION PROJECTS ARE NOT REQUIRED FOR APPROVED ADC MATERIALS. ADDITIONAL CONDITIONS TO ADDRESS LOCAL CONCERNS MAY BE APPLIED BY LEAs AS PERMIT TERMS AND CONDITIONS.	YES	20690(b)
C13-01	20690(b)(3)(A) SHOULD INCLUDE A MAXIMUM SIZE LIMIT OF 4 INCHES FOR GREEN MATERIAL ADC MATERIALS TO ENSURE A COMPACTED AND CONSISTENT MATERIAL FREE OF OPEN VOIDS.	DEMONSTRATION PROJECTS CONDUCTED TO DATE HAVE SHOWN THAT A PRESCRIPTIVE MAXIMUM SIZE LIMIT OF 4 INCHES IS NOT NECESSARY FOR SUCCESSFUL USE OF GREEN MATERIAL ADC. THEREFORE, A NON-PRESCRIPTIVE REQUIREMENT FOR MATERIAL SIZE HAS BEEN INCLUDED.	NO	20690(b)(3)(A)
C13-02	20695(b) SHOULD ADD A STATEMENT THAT THE OPERATOR SHALL CONSULT WITH THE LOCAL FIRE AUTHORITY REGARDING ANY FIRES CONTAINED ONSITE.	AS REQUESTED, THE PROPOSED REGULATION WILL ADD A STATEMENT REFERRING TO CONSULTATION WITH THE LOCAL FIRE AUTHORITY.	YES	20695(b)
C14-01	THE ECONOMIC IMPACT AND BUSINESS ASSESSMENT IS INCORRECT IN STATING THAT THE PROPOSED REGULATORY ACTION WILL NOT AFFECT THE CREATION OR ELIMINATION OF JOBS. NEWBY ISLAND LANDFILL REDUCED ITS OPERATIONS STAFF BY SEVEN PEOPLE DUE TO ADC.	EVEN IF THE JOB LOSSES OCCURRED AS STATED, THE PROPOSED REGULATIONS HAVE NO AFFECT SINCE THE ADC USE WAS ALLOWED UNDER PRIOR REQUIREMENTS. IN ADDITION, CIWMB STAFF HAVE BEEN UNABLE TO CONFIRM WITH THE OPERATOR THAT ANY JOB LOSSES OCCURRED BECAUSE OF ADC.	NO	GENERAL- INITIAL STATEMENT OF REASONS
C14-02	GIVEN THE ABOVE COMMENT AND AFFECTS ON COMPOSTING, THE STATEMENT OF REASONS ARE ALMOST CERTAINLY INCORRECT IN STATING THAT THE PROPOSED REGULATIONS WILL POSITIVELY AFFECT THE CREATION OF JOBS AND NEW BUSINESSES BECAUSE OF THE STREAMLINED APPROVAL OF ADC.	THE REGULATION WILL LIKELY HAVE A POSITIVE ECONOMIC IMPACT BECAUSE OF INCREASED MARKETS FOR SYNTHETIC PRODUCTS AND RECYCLED MATERIALS. IMPACTS TO THE COMPOSTING INDUSTRY ARE NEGLIGIBLE BECAUSE OF EXCESS FEEDSTOCK SUPPLY. SEE ALSO RESPONSE C14-01.	NO	GENERAL- INITIAL STATEMENT OF REASONS
C14-03	IN GENERAL, WE SUPPORT THE INCREASED REPORTING REQUIREMENTS OF 20690(a)(5) BUT THEY (AND 18800 ET SEQ) SHOULD CLEARLY REQUIRE DAILY RECORDING OF ADC TYPE AND ORIGIN, STOCKPILING, DISPOSAL, AND ACTUAL USE.	SEE COMMENT C12-03 FOR PROPOSED CHANGES TO 20690(a)(5). REQUESTED 14 CCR 18800 ET SEQ REVISION IS BEYOND THE SCOPE OF THIS RULEMAKING. DAILY RECORDING AS REQUESTED WOULD MORE APPROPRIATELY BE ADDRESSED IN CUP OR LEA PERMIT TERMS AND CONDITIONS.	NO	20690(a)(5) AND 18800 ET SEQ
C14-04	WHAT IS DEFINITION OF LANDFILL COVER EXTENDERS? WE SUGGEST CLARIFICATION THAT THE LIMIT WOULD BE NO MORE THAN 25% OF A MIXTURE.	AS REQUESTED, REVISIONS WILL BE PROPOSED TO NOTE THAT COVER EXTENDERS MEANS ADC MATERIALS BLENDED OR MIXED WITH SOIL.	YES	20690(a)(8)
C14-05	20690(b)(1)(A) SHOULD BE REVISED TO CLARIFY THAT AFTER GEOSYNTHETIC BLANKET ADC IS REMOVED, THE EXPOSED WASTE IS COVERED.	AS REQUESTED, REVISIONS WILL BE PROPOSED TO CLARIFY THIS SECTION. ALSO SEE COMMENT C09-02.	YES	20690(b)(1)(A)

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C14-06	THERE SHOULD BE AN EXPLICIT REQUIREMENT THAT ALL OR A SPECIFIED PORTION OF CONSTRUCTION AND DEMOLITION WASTE PASS THROUGH A SCREEN OF SPECIFIED SIZE.	THE PROPOSED STANDARD PROVIDES SUFFICIENT CONTROLS TO ENSURE THAT THESE MATERIALS USED AS ADC ARE OF APPROPRIATE SIZE TO MEET THE PERFORMANCE REQUIREMENTS. NO CHANGE IS REQUIRED.	NO	20690(b)(9)(A)
C14-07	SECTION 18809(a)(2) AND 18810(b)(2) SHOULD FORBID RECEIPT OF WASTE WITHOUT AN ATTENDANT PRESENT.	REVISION OF 14 CCR 18809(a)(2) AND 18810(b)(2) ARE BEYOND THE SCOPE OF THIS RULEMAKING. THE PROPOSED REQUIREMENT WOULD MORE APPROPRIATELY BE ADDRESSED IN CUP OR LEA PERMIT TERMS AND CONDITIONS.	NO	18809(a)(2) AND 18810(b)(2)
C14-08	SECTIONS 18810(c), 18812, AND 18813 SHOULD CLEARLY REQUIRE DAILY RECORDING OF ADC TYPE AND ORIGIN, STOCKPILING, DISPOSAL, AND ACTUAL USE.	REVISION OF 14 CCR SECTIONS 18810(c), 18812, AND 18813 AS REQUESTED ARE BEYOND THE SCOPE OF THIS RULEMAKING. THE PROPOSED REQUIREMENT WOULD MORE APPROPRIATELY BE ADDRESSED IN CUP OR LEA PERMIT TERMS AND CONDITIONS.	NO	18810(c), 18812, AND 18813
C15-01	SECTION 20695 SHOULD PROVIDE OBJECTIVE STANDARDS FOR EVALUATION OF FIRE AND LITTER. WE RECOMMEND USE OF ASTM E-1354 TESTING FOR FIRE CONTROL EVALUATION.	THE STANDARD REFLECTS CURRENT ACCEPTED PRACTICES IN ENFORCEMENT OF LITTER CONTROL. CIWMB STAFF ARE UNAWARE OF A TECHNICAL BASIS FOR MORE OBJECTIVE STANDARDS. SUCCESSFUL DEMONSTRATIONS HAVE NOT SHOWN THAT ASTM E-1354 IS NECESSARY TO ENSURE FIRE CONTROL.	NO	20695
C15-02	MUST ALTERNATIVE DAILY OR INTERMEDIATE COVER SYSTEMS USED SUCCESSFULLY IN OTHER STATES BUT NOT LISTED IN 20690 BE SUBJECT TO SITE SPECIFIC DEMONSTRATION PROJECTS?	YES. HOWEVER, THE DURATION OF THE DEMONSTRATION PRODUCT IS NOT SPECIFIED- USE OF SUPPORTING DOCUMENTATION FROM OTHER STATES WOULD BE A BASIS TO REDUCE THE SCOPE AND DURATION OF THE DEMONSTRATION PROJECT AS COMPARED TO MATERIALS WITHOUT SUPPORTING DATA.	NO	20690(b)
C15-03	WHAT ARE THE SPECIFIC QUALITATIVE EVALUATION CRITERIA THAT WOULD MAKE ONE FOAM PRODUCT ACCEPTABLE OR NOT, OR ONE KIND OF TARP PRODUCT ACCEPTABLE OR NOT? IS ANY FOAM OR TARP REGARDLESS OF COMPOSITION OR MATERIAL, ACCEPTABLE?	NEW FOAM PRODUCTS ARE RESTRICTED BY THE REQUIREMENT THAT MATERIALS BE COMPATIBLE WITH THE WASTE CLASSIFICATION OF THE LANDFILL (SEE 20690(a)(6)). NEW TARP AND FOAM PRODUCTS ARE ALSO RESTRICTED TO PRODUCTS WHICH MEET THE PERFORMANCE REQUIREMENTS FOR COVER.	NO	20690(b)(1) AND 20690(b)(2)
C16-01	CLARIFY WHETHER OR NOT THE 25% LIMIT OF 20690(a)(8) APPLIES TO ALL SLUDGE AND SLUDGE DERIVED PRODUCTS OR CHEMICALLY FIXED SEWAGE SLUDGE.	THE 25% LIMIT APPLIES ONLY TO COMPOST, CO-COMPOST, AND CHEMICALLY FIXED SEWAGE SLUDGE. SEE ALSO RESPONSES TO COMMENTS C03-01 AND C05-06.	NO	20690(a)(8)
C16-02	THERE SHOULD BE AN EXEMPTION FROM THE 25% LIMIT OF 20690(a)(8) FOR HIGH QUALITY CLASS A BIOSOLIDS. IN THAT MANNER, WASTE WATER AGENCIES WOULD HAVE AN INCENTIVE TO PRODUCE COVER MATERIALS WITH LOWER THREAT TO PUBLIC HEALTH AND SAFETY.	ADDING AN EXEMPTION TO THE 25% LIMIT FOR CLASS A BIOSOLIDS IS BEYOND THE SCOPE OF THIS RULEMAKING. LEGISLATION WOULD BE REQUIRED TO REVISE PUBLIC RESOURCES CODE (PRC) SECTION 42245	NO	20690(a)(8)

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C16-03 C17-01 C18-01	THE WORDING OF 20690(b)(4)(B) IS SO VAGUE THAT IT WILL BE IMPOSSIBLE TO ENFORCE. THE STANDARD SHOULD USE A MINIMUM SOLIDS CONTENT SUCH AS 50%. SUPPORTS REGULATIONS. SUPPORTS REGULATIONS.	THE PROPOSED SECTION WILL BE CHANGED TO REMOVE THE TERM "HOMOGENEOUS" TO IMPROVE CLARITY (SEE COMMENT C05-08). CHANGE IS NOT PROPOSED AS REQUESTED BECAUSE A 50% LIMIT WAS CONSIDERED BUT CONCLUDED BY LEAs AS POORLY ENFORCEABLE. COMMENT NOTED. COMMENT NOTED.	NO NO NO	20690(a)(8) GENERAL GENERAL
C19-01	20690(b)(4)-(b)(8) ARE INCONSISTENT WITH 20680(e) AND 20690(a)(6) WHICH ALLOW COVER MATERIAL CONSISTENT WITH THE CLASSIFICATION OF THE WASTE MANAGEMENT UNIT AS REQUIRED BY THE REGIONAL BOARD. THIS WOULD ALLOW COVER MATERIAL CLASSIFIED AS DESIGNATED WASTE.	THE INTENT WAS TO ALLOW FOR DESIGNATED WASTES TO BE USED AS COVER IF MEETING THE REGIONAL BOARD WASTE CLASSIFICATION AND CIWMB PERFORMANCE REQUIREMENTS. TO BE FULLY CONSISTENT AS REQUESTED, "NONHAZARDOUS" WILL BE PROPOSED TO BE REMOVED FROM 20690(b)(7). PROPOSED REPORTING REQUIREMENTS FOR WASTE-DERIVED ADC WILL DELETE THE WORD "DAILY" AS REQUESTED AND REFER DIRECTLY TO 14 CCR 18800 WHICH REQUIRES GENERAL QUARTERLY MONITORING AND, WEEKLY SURVEY MONITORING AS SPECIFIED IN 14 CCR 18805. SEE ALSO C12-03.	YES	20690(b)(7)
C19-02	REMOVE "DAILY" FROM THE RECORD KEEPING REQUIREMENTS OF 20690(a)(5).		YES	20690(a)(5)
C19-03	LANGUAGE FOR GREEN MATERIAL ADC OF 20690(b)(3)(A) SHOULD BE REVISED TO IMPROVE CLARITY.	THE PROPOSED REGULATION WILL BE REVISED FOR CLARITY AS REQUESTED.	YES	20690(b)(3)
C19-04	THE REFERENCED STANDARD FOR AUTO SHREDDER WASTE OF 20690(b)(6) COULD STILL RESULT IN MATERIAL WHICH EXCEEDS HAZARDOUS CRITERIA. IT IS PRESUMED THAT 20690(b)(6) WHICH TAKE ENSURE THAT ONLY DESIGNATED OR NONHAZARDOUS AUTO SHREDDER WASTE WOULD BE ACCEPTED.	FOR CLARITY, THE PROPOSED REGULATION WILL DELETE THE SPECIFIC REFERENCE AND REPLACE WITH "AUTO SHREDDER WASTE SHALL BE TREATED PURSUANT TO 22 CCR". SUCH WASTE NOT TREATED IN ACCORDANCE WITH THE 22 CCR APPROVED METHODS HAS NOT BEEN DEMONSTRATED FOR ADC.	YES	20690(b)(6)
C19-05	IT IS UNCLEAR AS TO WHAT LEVEL OF "COMPACTION" IS REQUIRED TO SATISY THE PERFORMANCE REQUIREMENTS OF THE REGULATIONS. RATHER THAN USING THE WORD "COMPACTED", A CLEARER STANDARD IS NEEDED.	THE INTENT OF THE TERM COMPACTED IS TO PROVIDE A COVER MATERIAL SUFFICIENTLY INTACT AND CONSISTENT TO MEET THE PERFORMANCE REQUIREMENTS. EQUIPMENT TRACKING OVER THE SURFACE DURING SPREADING IS ADEQUATE BUT OTHER METHODS OF APPLICATION MAY BE ACCEPTABLE.	NO	GENERAL
C19-06	IT IS UNCLEAR AS TO HOW THE PROCEDURE OF USING ALTERNATIVE COVER PERFORMANCE STANDARDS (20695(d)) WOULD WORK. IS A PERMIT REVISION NECESSARY?	A PERMIT REVISION WOULD NOT BE REQUIRED FOR CIWMB CONCURRENCE BECAUSE SUCH APPROVALS ARE DELEGATED TO THE DEPUTY DIRECTOR. THE INTENT IS TO ALLOW USE OF IMPROVED OR MORE APPLICABLE METHODS AND CRITERIA NOT REFLECTED IN THE STANDARD.	NO	20695(d)

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C20-01	THE DRAFT REGULATIONS CALL FOR THE EA TO APPROVE ADC WITH CONCURRENCE BY THE BOARD. DOES THIS MEAN THAT A LETTER TO THE CIWMB APPROVING ADC USAGE IS ADEQUATE OR DOES IT MEAN THAT THE EA MUST INCORPORATE THE USAGE INTO A NEW PERMIT FOR CIWMB CONCURRENCE? IT IS SUGGESTED THAT ODORS BE ADDED TO THE PERFORMANCE STANDARDS OF 20695 OR, FOR FLEXIBILITY, THE PERFORMANCE STANDARDS SHOULD BE TOTALLY ELIMINATED.	CIWMB CONCURRENCE (LETTER FROM DEPUTY DIRECTOR) IS ONLY REQUIRED FOR DEMONSTRATIONS OF MATERIALS NOT SPECIFIED IN 20690(b)(1-10). EA DETERMINES IF A REVISED PERMIT OR RFI AMENDMENT ALONE IS REQUIRED TO REFLECT ONGOING ADC USE PER 27 CCR 21620 AND 21665. SEE ALSO COMMENT C06-01 AND C12-01. SEE COMMENT C09-04 FOR ISSUE OF ODORS. THE PERFORMANCE STANDARDS ALREADY ALLOW FLEXIBILITY FOR THE EA TO REQUIRE THEM ONLY AS THEY DETERMINE NECESSARY.	NO	GENERAL- PERMITTING
C20-02			NO	20695
C21-01	USE OF THE WORDING OPEN VOIDS IS VAGUE AND SHOULD BE DELETED. THE REQUIREMENT FOR COVERING ALL WASTE WOULD MAKE THIS WORDING UNNECESSARY. SANITATION DISTRICTS SUGGEST REWORDING 20690(b)(1) TO IMPROVE CLARITY.	THE INTENT OF CONTROLLING OPEN VOIDS IS TO PREVENT DAYLIGHTING, AND BRIDGING OF WASTE WHICH PROVIDES VECTOR HARBORAGE. IN DISCUSSION WITH LEAs IT WAS CONCLUDED THAT ADDITIONAL LANGUAGE OTHER THAN COMPLETE COVERAGE WAS DESIRABLE TO AVOID NOTED PROBLEMS. THE PROPOSED REGULATION HAS BEEN REVISED TO REFLECT THIS COMMENT.	NO	GENERAL
C21-02			YES	20690(b)(1)
C22-01	CHANGES TO THE DEFINITION OF OPERATING DAY OTHER THAN A STANDARD 24-HOURS SHOULD BE DELETED. THERE IS NO JUSTIFICATION PRESENTED FOR THE THICKNESS LIMITS FOR AUTO SHREDDER WASTE, ASH MATERIALS, SHREDDED TIRES, CONTAMINATED SEDIMENT, AND CONSTRUCTION AND DEMOLITION MATERIALS.	THE REGULATION ESTABLISHES THE OPERATING DAY FOR COVER AS SPECIFIED IN THE PERMIT IN ORDER TO CONFORM WITH PAST CIWMB CONCURRENCE ACTIONS. US EPA HAS CONCURRED THAT THE OPERATING DAY MAY BE >24 HOURS IF THERE IS CONTINUOUS PLACEMENT OF WASTES.	NO	20680(a) AND 20690(a)(2)
C22-02			NO	GENERAL
C22-03	THE PROPOSED REGULATIONS PROVIDE FOR UNRESTRICTED USE OF CONSTRUCTION AND DEMOLITION MATERIALS WITHOUT ANY TESTING BEING CONDUCTED. THE BOARD SHOULD REQUIRE SITE SPECIFIC DEMONSTRATION PROJECTS BEFORE ALLOWING USE.	THE PROPOSED MAXIMUM AND MINIMUM THICKNESSES ARE BASED ON SUCCESSFUL SITE SPECIFIC DEMONSTRATION PROJECTS.	NO	20690(b)(9)
C22-04			NO	20700

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C22-05	CONSISTENT WITH THE DIRECTIVE OF AB1647, THE CIWMB SHOULD POSTPONE ANY ALLOWANCE FOR THE USE OF ALTERNATIVE INTERMEDIATE COVER UNTIL THE POTENTIAL IMPACT CAN BE FULLY CONSIDERED.	NO PUBLIC HEALTH AND SAFETY BASIS EXISTS TO DISALLOW DEMONSTRATIONS FOR ALTERNATIVE INTERMEDIATE COVER (AIC). ANALYSES SHOW THAT THERE WILL BE NO IMPACT TO THE COMPOSTING INDUSTRY FROM THE POTENTIAL USE OF AIC. (2/97 CIWMB MEETING)	NO	20700
C22-06	THE CIWMB SHOULD ADOPT A POLICY TO VERIFY ON AN ANNUAL BASIS THAT THE QUANTITY OF ADC USED IS APPROPRIATE. THE CIWMB SHOULD DIRECT STAFF TO REVIEW THE IMPACT OF THE CIWMB'S REGULATIONS ON THE DEVELOPMENT OF ADC AND COMPOSTING PROGRAMS IN TWO YEARS AND REVISE THE REGULATIONS IF NECESSARY TO ADDRESS ISSUES RAISED IN PRC	THE REQUESTED POLICY IS BEYOND THE SCOPE OF THE PROPOSED REGULATIONS. THE CIWMB ALREADY EVALUATES THE QUANTITY OF ADC USED ON A QUARTERLY BASIS PER 14 CCR 18800 ET SEQ TO ENSURE THAT THE QUANTITY IS APPROPRIATE.	NO	GENERAL
C22-07	41781.3(b).	THE CIWMB HAS ALREADY DIRECTED STAFF TO PROVIDE ONGOING REVIEW OF ADC USE AND THE ADC REGULATIONS ON THE COMPOSTING INDUSTRY. FURTHER DIRECTION IS UNNECESSARY.	NO	GENERAL